

THE BERNARD M. BARUCH COLLEGE

OF

THE CITY UNIVERSITY OF NEW YORK

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HERBERT ARKIN  
*Professor Emeritus*

March 10, 1982

Mr. Allan J. Topol  
Covington & Burling  
1201 Pennsylvania Avenue N.W.  
P.O. Box 7566  
Washington, D.C. 20044

Dear Mr. Topol:

I am attaching my analysis and audit of the Federal Trade Commission 'tar', nicotine and carbon monoxide figures dated December 1981 (Test No. 24).

I have once again compared the carbon monoxide averages obtained by the Federal Trade Commission laboratory with those obtained by the Tobacco Industry laboratory. While the FTC carbon monoxide figures in the last report were higher than those of the Tobacco Industry laboratory, the current averages were about 3% lower. This is partly due to the change in the computer program which they announced.

A huge increase is noted in the number of impossible values. A total of 107 such values were located including negative water values, negative TPM values, etc., indicating an increasing problem in performing measurements for low TPM cigarettes.

Again, there was an increase in the number of data handling errors.

Sincerely,

Herbert Arkin

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